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August 31, 1979

EPA #5241
PCB 79-166

Bill Seltzer, Enforcement

Dave Wietes - F.O.S. - Southern Region

SHELL OIL CO. - Wood River, Illinois - Petition for Variance

On 8/30/79, I met with John Cole, Quality Control Manager for Shell's Wood River Refinery. We discussed the petition for variance from Rule 501 of Chapter IX.

There is only one deficiency in the petition as I see it, and it is a crucial part. In the Procedural Rules, Part 401(a) #4 it states, "The quantity and types of materials discharged from the process or activity requiring the variance; the location of the points of discharge and the identification of the receiving waterway or land"... shall be listed. The petition is vague on this point in that the only wastes they've named are "sour water, slop oil, oily sludge, tank bottoms and caustic and acid sump pumpings." The points of discharge have been referred to in the petition as "various parts of the petitioner's property".

In actuality, various special wastes (compositions unknown) are discharged at three major points. One point is a large lagoon receiving liquids and solids. This settling pond overflows into two smaller ponds. No flow was observed leaving the site, however.

Another disposal point is an area where dirt and rock are disposed of. Also dumped here is sulfur. Small amounts of various other debris were observed and an oil film was present on the water at the base of the fill slope.

The third disposal point is a trench/lagoon where tank bottoms are dumped. These bottoms are periodically landspread on Shell property after the trench fills and is cleaned out.

Other "special wastes" are transported around the refinery to various destinations for recovery or treatment.

All discharges of wastes occur on Shell's property so the adverse effects to surrounding properties would most likely be sub-surface. Little is documented about the geology of the disposal sites but it appears they were originally natural wetlands.

The vegetation near the disposal sites does not appear to have been adversely affected to any large degree and there was a surprisingly large amount of wildlife (birds).

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A variance from Rule 501 would be a logical approach to Shell's problems relating to the large number of manifests that would have to be completed. Of the six-page manifest, four pages would stay with Shell Oil as they are generator, hauler, and disposer. Shell also has its own "in-house" manifest system.

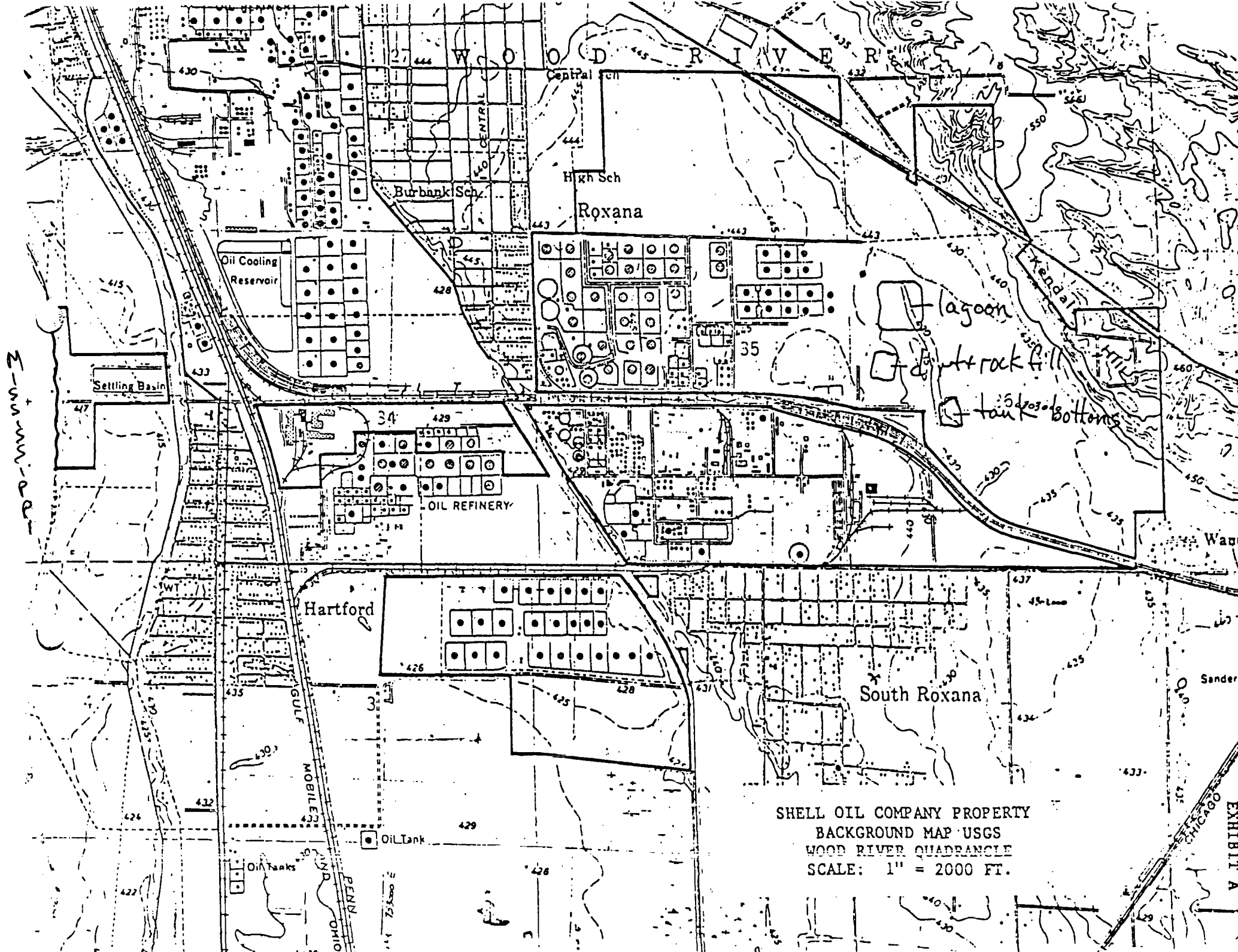
The petition deficiency described earlier should be addressed before granting of the variance. Another point is that these disposal sites on Shell's property are not permitted by LPC. The solids/liquids lagoon is permitted by WPC, Permit #1979-E0-4328.

It is my opinion the variance should be granted following receipt of the necessary information. Please advise of follow-up deemed necessary.

NOTE: The map shows the approximate locations of the present disposal sites.

DLW:pbo

cc: Bill Child
cc: Tom Cavanagh
cc: Southern Region ✓



SHELL OIL COMPANY PROPERTY
BACKGROUND MAP USGS
WOOD RIVER QUADRANGLE
SCALE: 1" = 2000 FT.

EXHIBIT A